

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

UNITED STATES OF AMERICA,

Plaintiff,

v.

LEE ROBERT MOORE,

Defendant.

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Criminal Action No. 15- 63 - UNA

REDACTED

INDICTMENT

The Grand Jury for the District of Delaware charges that:

Count 1

(Attempted Transfer of Obscene Material to a Minor)

From on or about August 24, 2015 through on or about November 8, 2015, in the State and District of Delaware and elsewhere, the defendant, LEE ROBERT MOORE, did knowingly use a facility and means of interstate and foreign commerce; to wit: the Internet, to attempt to transfer obscene matter to another individual who had not attained the age of 16 years, knowing that the other individual had not attained the age of 16 years, in violation of Title 18, United States Code, Section 1470.

Forfeiture Count

Upon conviction for violating Title 18, United States Code, Section 1470, as set forth in Count 1, the defendant, LEE ROBERT MOORE, shall forfeit to the United States any property, real or personal, constituting or derived from any proceeds that LEE ROBERT MOORE obtained directly or indirectly as a result of the aforementioned violations; and any and all

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DISTRICT OF DELAWARE
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property, real or personal, used or intended to be used in any manner or part to commit and to promote the commission of the aforementioned violations, including but not limited to the following:

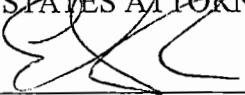
1. iPhone 5 (space grey);
2. iPhone 6 (black);
3. Dell Desktop, Model D006D, Vostro, Serial #8284327461; and
4. HP Desktop, Model M1070N, Serial#MXK-43408BL

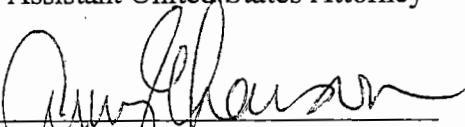
pursuant to Title 18, United States Code, Section 1467.

A TRUE BILL:

Foreperson

CHARLES M. OBERLY, III
UNITED STATES ATTORNEY

By: 
Edward J. McAndrew
Assistant United States Attorney

By: 
Amy Larson
Trial Attorney, Child Exploitation
& Obscenity Section

Dated: December 2, 2015